

B. The steps of the second level route are explicitly connected independent of the connection of the steps of the first level route so the second level route flows without use of level route connections.

This distinguishes from Du which relies on the first level route to directly control the flow between the route segments of the second level route. That is, the present invention provides the second level route connected in the sequence of the first level route and the first level route is not required for the execution of the second level route.

C. The first level workflow and second level workflow are explicitly stated as independent such that each has an independent and complete route and operates asynchronously without reliance on the other.

In Du, the second level workflow is dependent on the first level workflow. In fact, in Du, the first level workflow and the segment connecting portion of the second level workflow are the same workflow [HP Open PM Engine] and the first level workflow invoked route segments of the second level workflow similar to subroutine calls. In Du, while the second level route segments execut in second level workflows, the connection of the second level route segments are performed in the first level workflow where each LRM call is invoked from a GRM step. The second level workflow did not connect the second level route segments. That is a first LRM segment does not connect to a second LRM segment in the second level workflow but relies on the connection of a first GRM step to a second GRM step in the first level workflow.

3) Note that the original Claim 32 discloses a third computer with a program that connects the second level route segments based on the first level route. The connection process creates second level connections that are independent of the first level connections. While Claim 32 has been amended to be consistent with Claims 21 and 29, Claim 32 in its original form disclosed an invention different from Du in that the connection of second level route segments are independent of the first level step connections. Du relies on the first level connections to connect the second level segments during route execution.

4) The claims distinguish and identify what is illustrated in Figure 3A of the subject disclosure where the route segments are connected outside of the object route as illustrated by the connection of the Audit step in the ERP Stage object to the A1 Set Up step in the ERP Step A1 object or the B1 Retest step in the ERP Step B1 object to the

10/036,200 Object Based Workflow Route N. K. Ouchi 1/24/2007 Page 2 of 7

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Repair step in the ERP Step A1 object. The shopfloor workflow uses the detailed route asynchronous to the ERP workflow.

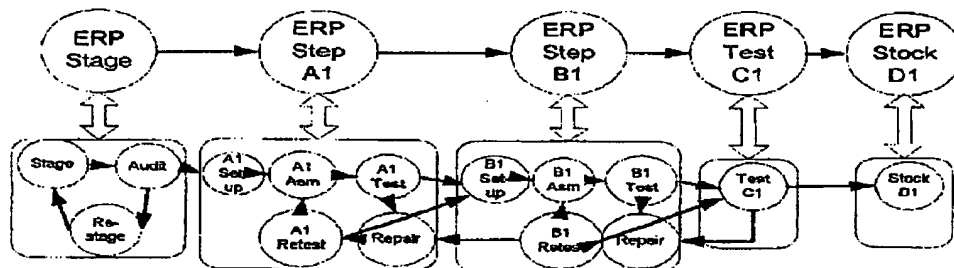


Figure 3A

Present invention Figure 3A.

- 5) Many dependent claims were amended to remove "can" from the language. For example, "can indicate to" was changed to "signals".
- 6) The claims are grouped: 21-28, 29-31, and 32-39 where claims 21, 29, and 32 are independent claims. The claims marked original were the version submitted on 8/25/06.

Respectfully submitted

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